

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	
)	Criminal Action No. 17-40010-TSH
KEVIN A. PERRY, JR.)	
Defendant.)	

UNITED STATES' BILL OF PARTICULARS FOR FORFEITURE OF ASSETS

The United States of America, by and through its attorney, William D. Weinreb, Acting United States Attorney for the District of Massachusetts, hereby files the following Bill of Particulars for Forfeiture of Assets.

On March 16, 2017, a federal grand jury sitting in the District of Massachusetts returned a fourteen-count Indictment, charging defendant Kevin A. Perry, Jr. (the “Defendant”), with Money Laundering, in violation of 18 U.S.C. § 1956(a)(1)(B)(i) (Counts One through Nine), Unlawful Cash Structuring, in violation of 31 U.S.C. § 5324(a) (Counts Ten through Twelve), False Statement on a Loan Application, in violation of 18 U.S.C. § 1014 (Count Thirteen), and Distribution of Fentanyl, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(2)(A)(iv) (Count Fourteen). The Money Laundering Forfeiture Allegation in the Indictment gave the Defendant notice that, pursuant to 18 U.S.C. § 982(a)(1), the United States intended to seek forfeiture of any property, real or personal, involved in Counts One through Nine of the Indictment, and any property traceable to such offenses.

Pursuant to, and without limiting in any manner the Money Laundering Forfeiture Allegation, the United States hereby gives notice that it intends to seek the forfeiture of, without limitation, the following specific properties:

- a. the real property located at 1 Watson Drive, Millbury, Massachusetts, including all buildings, improvements and appurtenances thereon, more particularly described in a quitclaim deed recorded at the Worcester County Registry of Deeds, Book 54961, Page 151;
- b. the real property located at 2 Watson Drive, Millbury, Massachusetts, including all buildings, improvements and appurtenances thereon, more particularly described in a quitclaim deed recorded at the Worcester County Registry of Deeds, Book 54961, Page 151;
- c. the real property located at 3 Watson Drive, Millbury, Massachusetts, including all buildings, improvements and appurtenances thereon, more particularly described in a quitclaim deed recorded at the Worcester County Registry of Deeds, Book 54961, Page 151; and
- d. the real property located at 4 Watson Drive, Millbury, Massachusetts, including all buildings, improvements and appurtenances thereon, more particularly described in a quitclaim deed recorded at the Worcester County Registry of Deeds, Book 54961, Page 151.

Respectfully submitted,

WILLIAM D. WEINREB
Acting United States Attorney,

By: /s/ Doreen M. Rachal
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Dated: April 19, 2017

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the Electronic Case Filing system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: April 19, 2017

/s/ Doreen M. Rachal

DOREEN M. RACHAL

Assistant United States Attorney